

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

HANNAH CRAMER, et al.,)	
)	
Plaintiffs,)	
v.)	3:18cv39-HEH
)	
ARKESIA, INC., et al.,)	
)	
Defendants.)	

NOTICE OF SCHEDULE CONFLICT/REQUEST FOR RELIEF

On May 16, 2018, the Court set an initial pre-trial conference in this matter for Friday, June 15, 2018, at 11:00 AM.

On May 7, 2018, Judge Trenga of the Alexandria Division issued a Notice of Hearing in *Harrell v. Freedom Mortgage Corporation*, 1:18cv275-AJT-TCB, for June 15, 2018, at 10:00 AM. Judge Trenga's Notice is attached hereto as Exhibit A.

Justin P. Keating, Virginia counsel in this matter, is co-lead counsel for Plaintiffs in the Harrell matter and is arguing the Motion to Dismiss set for hearing on June 15th. Given that, Plaintiffs' counsel in this matter respectfully request either (a) Keating be excused from attendance at the initial pre-trial conference in this matter or (b) the conference be set for another date. Undersigned counsel discussed this with Defendant's counsel who has graciously agreed not to oppose this Request or either of these options. If the Court finds the first option otherwise appropriate, undersigned counsel assures the Court that Plaintiff's out of state counsel have thoroughly familiarized themselves with the Local Rules and this Court's practices on pre-trial litigation and will be well prepared to discuss any substantive or procedural matters that may arise

at the conference. As an alternative hearing date, all counsel are available for a pre-trial conference on June 22, 2018. If the Court finds it appropriate to re-schedule the conference from June 15th but June 22nd does not fit the Court's schedule, counsel will confer and offer additional mutually agreeable dates.

Draft Proposed Orders for each proposed Option have been filed with this Notice/Request.

Respectfully submitted,

_____/s_____

Justin P. Keating
VA Bar #75880
BEINS, AXELROD, P.C.
1625 Massachusetts Ave., NW
Suite 500
Washington DC 20036
Tele: (202) 328-7222 x235
Fax: (202) 328-7030
jkeating@beinsaxelrod.com

Lloyd R. Ambinder
(Admitted *Pro Hac Vice*)
LaDonna Lusher
(Admitted *Pro Hac Vice*)
VIRGINIA & AMBINDER, LLP
40 Broad Street, 7th Floor
New York, New York 10004
Tel: (212) 943-9080
Fax: (212) 943-9082
lambinder@vandallp.com
llusher@vandallp.com

COUNSEL TO PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of May, 2018, I will cause the foregoing Plaintiffs' NOTICE OF SCHEDULE CONFLICT/REQUEST FOR RELIEF with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Thomas M. Lucas
Kristina H. Vaquera
Milena Radovic
Jackson Lewis, PC
500 E. Main Street, Suite 800
Norfolk, Virginia 23510
Tele: (757) 648-1445
Fax: (757) 648-1418
thomas.lucas@jacksonlewis.com
vaquerak@jacksonlewis.com
milena.radovic@jacksonlewis.com

_____/s/____

Justin P. Keating